

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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COMMENTS ON REPORT OF THE ELECTRONIC WORKING GROUP ON THE REVISION OF THE PROCEDURAL MANUAL

The following comments have been received from the following Codex Members and observers:
Kenya and Norway

This document contains late submissions of comments received after the deadline, but those were submitted before 12 April 2007.

Kenya

Kenya supports the proposed text in page 89 which reads “[Food Additive functional class] used in accordance with Tables 1 and 2 of the Codex General Standard of Food Additives in food category x.x.x.x [food category name] or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.”) as this will help in avoiding the exclusion of non-standardized additives.

Kenya supports the proposed text in page 93 which provides for the separation of food additives and food contaminants.

Kenya supports the proposed text in page 94 (a) because the steps in the new text are clear.

Kenya supports the proposed text in page 94 (b) because GSFA is a principle reference while setting additives in commodity standards.

Kenya supports the proposed text in page 94 (c) because responsibilities are clear however we don't have a problem with the word working papers

Kenya supports the proposed text in page 94 (f) because the proposed text makes the endorsement by CCFA broader and not limited to the use of additives at the level of the end products.

Kenya supports the deletion of the text in page 95 on good manufacturing practices (GMP) as suggested by the working group.

Norway

Norway would like to thank the Working Group and especially the delegation of Switzerland for the extensive work on the proposal for a revision of the procedural manual.

In general Norway supports the proposal of the Working Group. The proposed text will in our opinion facilitate the relationship between food additives in commodity standards and the General Standard for Food Additives (GSFA). The text ensures that the GSFA is the single authoritative reference point for food additives, but will also provide for the distinctive character of standardised food as they reference which functional classes of food additives that are authorised in those standardised foodstuffs. We believe this clarification contributes to accelerate the development of the GSFA.

Format for Codex Commodity Standards p 89

- Norway supports the proposal for new text.

Norway agrees to the principle of the General Standard for Food Additives (GSFA) as the single authoritative standard for food additives. This provides simplicity and transparency for both stakeholders and governments.

However in the past there has been a lot of discussion on how to implement the Commodity Standards into the GSFA as some food categories cover both standardised and non-standardised foodstuffs. This discussion is understandable; there is no use to develop proposals for necessary additives in the commodity standard if these are superseded by the GSFA every time. At the same time, the current text which demands that the Commodity Standard specifies the additive and maximum limit will lead to a difficult implementation. The current situation also seems fragile and not robust enough to handle technological development in new additives with the same technological function.

The proposed new text allows for Commodity Standards to identify necessary functional classes of food additives, instead of single food additives and their maximum limits. This is a very good proposal. It identifies what type of function an additive must perform, and allows for the additives within this functional class in the particular food category in the GSFA to be allowed.

There may be exceptional cases which may need derogation from the main rule, which is only to list functional classes. It is vital that this should only happen in rare cases. It may also be useful to identify some identification upon what is meant by exceptional cases in order to prevent this option to be chosen too often.

Relation between the Commodity Committees and General Committees p 92

- Norway supports the proposed new text.

The proposed new text provides for referral of all food additive provisions to the CCFA. Norway supports the Working Group that this clarifies the GSFA as the single authoritative reference point for food additives.

Food additives p 93

- Norway supports the proposal for separate sections for the relation between food additives and contaminants.

Food additives p 93 f

- Norway supports the proposed text.

Norway supports the proposal for a text that specifies that it is important that the Commodity Committee follows the guidance of the Preamble of the GSFA.

Food additives p 94

This text should be open for revision at a later stage as the consequences of additional points on the CCFA's agenda may cause additional delay in the development of the GSFA.

However transparency is important and this point provides for that. It is also especially important that any proposal for derogation from the main rule is identified at an early stage.

Regarding the text in brackets we have some questions. Norway has interpreted the intention of the text in the same way as the Working Group. But if the Commodity standard is to identify the functional classes for the additives that are authorised in the standardized product, then we do not see a need to identify INS numbers and ADI. That will only be necessary for the exceptions.

Proposal for text:

“When forwarding a food additive section of a commodity standard for endorsement by Codex Committee on Food Additives, the Secretariat should prepare a report to the Committee that includes the functional classes and technological justification.

With regard to exceptional cases where specific food additives and their maximum limits are given, the report should also indicate the International System (INS) number, the Acceptable Daily Intake (ADI) assigned by the Joint FAO/WHO Expert Committee on Food Additives, and technological justification, proposed level, and whether the additive was previously endorsed (or temporarily endorsed by the Codex Committee on Food Additives)”

Food additives p 94f, 95

- Norway supports the proposed text.

Terms of reference

- Norway supports the proposed text.